

Docket No. 87-5, 900 MHz Multiple Address Frequencies
 Docket No. 87-24, Cable TV/Broadcast Program Exclusivity
 Docket No. 87-136, Reallocation of Spectrum for Local Television Transmission Service
 Docket No. 87-215, Access Charges for Enhanced Service Networks
 Docket No. 87-268, Advanced Television Systems
 Docket No. 87-389, Revision of Part 15 (Low Power Communications Devices)
 Docket No. 87-530, Access Charges for Private Line Networks
 Docket No. 87-552, Equipment Authorization Procedures
 Docket No. 88-2, Open Network Architecture
 Docket No. 88-57, Connection of Inside Wiring to the Telephone Network
 Docket No. 88-96, Spectrum for Air-to-Ground Telephone Service
 Docket No. 89-78, Satellite Encryption Standards
 Docket No. 89-89, Satellite Syndicated Exclusivity
 RM-5879, Petition for 6425-6875 MHz Spectrum Allocation
 RM-6014, Petition for 18 GHz Video Distribution
 RM-6196, Petition for 220 MHz Allocation for Two-Way TV Return Channel
 Docket No. 89-554, Preparation for 1992 WARC
 Docket No. 90-5, Distribution of Video Entertainment at 18 GHz
 Docket No. 90-217, Pioneer Preference for Spectrum
 Docket No. 90-314, New Personal Communications Services
 RM-7628, C-Band Satellite Orbital Spacing
 Docket No. 91-1, Television Decoder Circuitry

Background and Experience

During 1987-1991, he has worked on the following projects and studies for selected clients:

- use of 28 GHz for point-to-multipoint distribution of video; -
- impact on equipment manufacturers if Bell Operating Companies are permitted to diversify into manufacturing and enhanced services;
- use of microwave to bypass telephone services in Manhattan;
- negotiations with FCC and Commerce Department staff on transmission power levels applicable to microwave intrusion alarms and motion sensors;
- technical means for implementing "syndicated exclusivity" in cable TV systems;
- regulatory feasibility of implementing new communications and radiolocation technologies in unused or little-used radio spectrum allocations;
- testimony used in five Congressional hearings;
- negotiations of legislative language affecting Digital Audio Tape consumer equipment;
- negotiations with the U.S. Copyright Office regarding the permissibility under the copyright laws of cable converter on-screen displays and menus;
- participation as an expert witness in lawsuits involving digital satellite earth stations, digital microwave systems and home satellite dishes;
- reallocation of Federal Government spectrum for non-Government use in accordance with the Emerging Telecommunications Technologies Act of 1990; and
- modification of FCC policies on C-band satellite spacing.

As Vice President, Corporate Affairs for M/A-COM, Inc., a Fortune 500 telecommunications manufacturing company, Dr. Krauss was responsible for policy development in the areas of federal government legislative and regulatory policies, and coordination of technical standards. This included spectrum allocations and other regulatory activity of the Federal Communications Commission, as well as international trade, export policy and other issues of concern to "high-tech" industry. He directed legislative and regulatory initiatives in areas such as domestic and international telecommunications industry structure, orbital spacing, satellite earth station standards, microwave spectrum allocations, international trade and export policy.

In 1985 and 1986, he met with numerous Congressmen and their staffs to educate them on satellite video scrambling. He prepared testimony for witnesses in four Congressional hearings, briefed witness for hearings, and drafted comments for an FCC inquiry on the subject.

Dr. Krauss played a major role in influencing the design of Very Small Aperture Satellite Terminal networks (VSATs) to operate at Ku-band rather than C-band in order to minimize the burdens of FCC frequency coordination and licensing policies. He successfully convinced FCC staff to permit blanket licensing for each network rather than station-by-station license. In response to proposed licensing fees of \$1350 per earth station, Dr. Krauss led an industry coalition that successfully convinced FCC and Congressional staff to charge VSAT licensing fees on a per-network basis rather than a per-station basis.

In international trade matters, Dr. Krauss participated in industry meetings to develop telecommunications trade policy. He prepared testimony for a witness at 1985 hearings on the "Wirth-Florio" telecommunications trade bill. Dr. Krauss accompanied corporate executives to Japan to negotiate with the Ministry of Post and Telecommunications staff on microwave equipment standards and user eligibility. As a result, the Japanese MPT has allowed the company to sell its equipment in Japan.

In 1991, the FCC awarded the first microwave broadcasting license using the 28 GHz band to a client of Dr. Krauss. Using a regulatory strategy that Dr. Krauss conceived and implemented, the client now has an FCC license to use 1000 MHz of radio spectrum in New York City for video broadcasting.

In addition, Dr. Krauss has participated in numerous FCC proceedings on microwave equipment technical standards and eligibility regulations for 18, 23, 31 and 38 GHz frequencies. He has prepared formal comments and petitions, as well as personally meeting with the FCC staff. The policies that were adopted by the FCC created many new business opportunities for microwave manufacturers and communications service providers.

Education

BS, Physics	Illinois Institute of Technology, 1964
PhD, Physics	Case Western Reserve University, 1969

Previous Affiliations

1980-1986 M/A-COM, Inc., Rockville, MD
1976-1979 Federal Communications Commission, Washington, DC
1973-1975 American Satellite Corporation, Germantown, MD
1970-1973 Bell Telephone Laboratories, Murray Hill, NJ

Recent Publications

"FCC Opens Up K-Band for Low Cost Communications," published in Microwave Journal, January 1981.

"Implications of FCC Regulation of Telecommunications Technical Standards," presented to the 1982 Communications Techniques Seminar, IEEE New York, New Jersey and Princeton Section, March 1982, and published in IEEE Communications Magazine, September 1982.

"Common Carrier Trends: An Equipment Manufacturer's View," published in Telematics, December 1984.

"The FCC's Microwave Rules Open New Spectrum Uses", published in Telecommunications, June 1987.

"Satellite Communications: Legal and Regulatory Issues", published in Datapro Reports on Communications Alternatives, October 1987, revised May 1989.

"Microwave Communications: Legal and Regulatory Issues", published in Datapro Reports on Communications Alternatives, December 1987.

"HDTV--Its gonna be great--or is it?", speech presented at the Annual Telecommunications Industry Association-FCC Dinner, March 14, 1989.

"Monday Memo--A High Definition TV Commentary," Broadcasting Magazine, November 30, 1989, p. 30.

"Politics, Technology and Economics of High Definition TV," seminar presented at Stanford University Department of Engineering Economic Systems, November 16, 1989.

"Cable-Ready HDTV: Cable May Be The First To Deliver HDTV To The Home" in HDTV: The Politics, Policies, and Economics of Tomorrow's Television, edited by John F. Rice, Union Square Press, New York, 1990

In the Matter of:)

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Amendment of Parts 2 and 22 of)
the Commission's Rules to Provide)
for a Land-Based Common Carrier)
Ground-to-Air Paging Service in)
the 930 to 931 MHz Band)

RM -

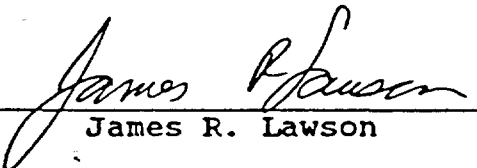
DECLARATION

I, JAMES R. LAWSON, do hereby declare that:

1. I am the Vice President - Technical for PacTel Paging.
My business address is 12221 Merit Drive, Suite 800, Dallas, Texas
75251.

2. I have reviewed the PETITION FOR RULEMAKING OF PACTEL
PAGING, dated October 15, 1991, in the above-captioned matter.
Except for facts of which official notice may be taken, the facts
set forth therein, and any attachments thereto, are true and
correct to the best of my knowledge, information and belief.

This declaration is made under penalty of perjury under the
laws of the United States.


James R. Lawson

Dated: October 15, 1991

CERTIFICATE OF SERVICE

I, Tana C. Maples, a secretary in the law firm of Bryan, Cave, McPheeters & McRoberts, hereby certify that on this 15th day of October, 1991, copies of the foregoing "PETITION FOR RULEMAKING OF PACTEL PAGING" were hand delivered or mailed, postage prepaid, First-Class U.S. Mail, to the following:

Chairman Alfred C. Sikes*/
Federal Communications Commission
1919 M Street, N.W.
Room 814
Washington, D.C. 20554

Commissioner James H. Quello*/
Federal Communications Commission
1919 M Street, N.W.
Room 802
Washington, D.C. 20554

Commissioner Sherrie P. Marshall*/
Federal Communications Commission
1919 M Street, N.W.
Room 826
Washington, D.C. 20554

Commissioner Andrew C. Barrett*/
Federal Communications Commission
1919 M Street, N.W.
Room 844
Washington, D.C. 20554

Commissioner Ervin S. Duggan*/
Federal Communications Commission
1919 M Street, N.W.
Room 814
Washington, D.C. 20554

Thomas P. Stanley, Chief*/
Federal Communications Commission
Office of Engineering and Technology
2025 M Street, N.W.
Room 7002
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H. Franklin Wright, Chief*/
Federal Communications Commission
Frequency Liaison Branch
2025 M Street, N.W.
Room 7322
Washington, D.C. 20554

Richard M. Firestone, Chief*/
Federal Communications Commission
1919 M Street, N.W.
Room 500
Washington, D.C. 20554

Gregory J. Vogt, Chief*/
Federal Communications Commission
Mobile Services Division
1919 M Street, N.W.
Room 644
Washington, D.C. 20554

*/ Denotes delivery by hand, delivery charges prepaid

By: Tana C. Maples
Tana C. Maples

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